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October 19, 2020

VIA ECF

Honorable J. Paul Oetken  
United States District Judge  
Southern District of New York  
United States Courthouse  
40 Foley Square  
New York, NY 10007

*United States v. Kukushkin, et al.* 19 CR. 725 (JPO)

Dear Judge Oetken:

We are counsel for Andrey Kukushkin, a defendant in the above referenced matter. With **the consent** of the government and Pretrial Services, we write to request modification of Mr. Kukushkin's bail conditions to provide for Pretrial Services supervision as directed, without electronic monitoring.

Approximately one year ago, Mr. Kukushkin was released on a fully secured bond signed by three financially responsible individuals. In addition, his travel was and remains limited to the Eastern and Southern Districts of New York as well as the Southern, Central and Northern Districts of California. Mr. Kukushkin also surrendered his passports and agreed not to make any new applications for same. He also has been subject to electronic monitoring. Throughout the entirety of his pretrial release, again, approximately one year, Mr. Kukushkin has been fully compliant with all terms and conditions set by this Court and Pretrial Services.

Accordingly, with the **consent** of the government and Pretrial Services, Mr. Kukushkin respectfully requests that the terms and conditions of his release be amended to provide for Pretrial Services supervision as directed, without electronic monitoring. All other conditions of

Mr. Kukushkin's release would remain unchanged. As noted, the government and Southern District Pretrial Services Officer Joshua Rothman have **no objection** to the application.

In light of the foregoing, we respectfully request that the Court modify Mr. Kukushkin's release conditions as outlined above. We thank the Court for its consideration.

Respectfully submitted,

/s/ Gerald B. Lefcourt

Gerald B. Lefcourt

cc: All counsel (via ecf)  
Joshua Rothman, United States Pretrial Services Officer (via email)  
Nelson Barao, United States Pretrial Services Officer (via email)